AO 106 (Rev. 04/10) Application for a Search Warrant

UNITED STATES DISTRICT COURT

for the
District of South Carolina

In the Matter of the Search of
(Briefly describe the property to be searched or identify the person by name and address)

Express Mail Envelope EL554171276US addressed to Rafael Luna 194 Dorchester Ave Unit A Asheville, NC 28806

Case No. 2:17-cr-00491

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:
Express Mail Envelope EL554171276US addressed to Rafael Luna 194 Dorchester Ave Unit A Asheville, NC 28806

located in the ____________ District of South Carolina, there is now concealed *(identify the person or describe the property to be seized)*:
Evidence of possessing controlled substance with intent to distribute

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☑ evidence of a crime;
- ☑ contraband, fruits of crime, or other items illegally possessed;
- ☑ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	*Offense Description*
21 USC 841	Conspiracy to possess a controlled substance with intent to distribute
21 USC 843	Use of a communication device

The application is based on these facts:

☑ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: __________) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

L R Moody
Applicant's signature

L. R. Moody, U. S. Postal Inspector
Printed name and title

Sworn to before me and signed in my presence.
Authorized by telephone

Date: 2/24/2017

Mary Gordon Baker
Judge's signature

City and state: Charleston, SC

Mary Gordon Baker, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, L. R. Moody, depose and state the following,

1. I am a United States Postal Inspector and have been so employed in this capacity since 2005. I am currently assigned to the Charleston, SC domicile where my investigative responsibilities include narcotics investigations through which the United States Mail is used to conceal and transport illegal and/or controlled substances from one location to another.

2. I make this affidavit based upon personal knowledge derived from my participation in this investigation and/or information that I have learned from discussions with US Postal Inspectors; from the review of written reports of investigations; from the review of reports of physical surveillance conducted by federal agents and state and local officers; and/or from the review of reports of debriefings of sources of information and other witnesses.

3. This affidavit does not include all information that has been gathered, but merely includes an amount of evidence sufficient to support a finding of probable cause.

4. I know through prior investigations and trafficking intelligence developed by Postal Inspectors and other law enforcement officials that the Postal Service's Express Mail and Priority Mail services are frequently used by drug traffickers for shipping illegal or controlled substances and/or proceeds from the sale of illegal or controlled substances including steroids, ecstasy, cocaine, heroin, marijuana, and derivatives thereof.

5. I also know from my training and experience that drug traffickers prefer overnight or priority delivery services because of their speed, reliability, and the ability to track the article's progress to the intended delivery point. Additionally, I know from training and experience that some drug traffickers prefer to use the United States Postal Service instead of private delivery services, such as FedEx or UPS, because private companies do not always require search warrants to open parcels.

6. On February 24, 2017, special agents from the Department of Homeland Security (HSI) notified your affiant of an individual operating a drug trafficking operation out of Ladson, South Carolina named Robert MANSFIELD. During the investigation, HSI Agents determined that MANSFIELD had received approximately thirty-one shipments of suspected narcotics, mainly through international mail. One shipment occurred in 2009, another shipment occurred in 2010, and the remaining twenty-nine shipments occurred between August 2015 and the present date. The investigation revealed that the sources of supply for MANSFIELD are located mostly in mainland China and Hong Kong. MANSFIELD maintains a residence at 104 Pinewood Street Unit/Apartment E Ladson, South Carolina 29456.

7. Further, your affiant was informed by HSI agents that International Express Mail parcel, EA261795591HK, was seized on February 2, 2017, at the John F.

Kennedy air mail facility. The parcel was addressed to 104 Pinewood Street Unit/Apartment E Ladson, South Carolina 29465. The parcel contained a shipment of 1,010 grams of fentanyl. The return address was listed as No 122 Hong Kong Street Kowloon Bay, Horngjaan, Hong Kong.

8. HSI agents provided details on historical seizure information of shipments destined for MANSFIELD. Specifically, the following packages that were destined for MANSFIELD were seized:

- **February 02, 2017-** 1,010 grams of fentanyl, sent via air shipment to MANSFIELD from Hong Kong

- **April 19, 2016-** 2 grams of MDMA (also known as ecstasy) a recreational designer drug; sent via air shipment to MANSFIELD from China

- **May 28, 2015-** 26 grams of ALPHA-PVP (also known as flakka or gravel, a recreational designer drug); 3 grams of Spice, a recreational designer drug; and 26 grams of Ethylone, a recreational designer drug; sent via air shipment to MANSFIELD from China

- **September 5, 2014-** 1.6 grams of Amphetamines; sent via air shipment to MANSFIELD from the Netherlands

- **September 5, 2014-** 2.3 grams of Marijuana; sent via air shipment to MANSFIELD from Germany

- **October 28, 2014-** 3.4 grams of MDMA (also known as Ecstasy) a recreational designer drug; sent via air shipment to MANSFIELD from China

9. The above listed seizures are part of thirty-one (31) importations destined for MANSFIELD which were identified through law enforcement and importation data research conducted by HSI and Customs and Border Protection. These database targeting systems target all foreign mail coming into the United States.

10. On February 24, 2017, at approximately 10:00 AM, HSI agents observed MANSFIELD leave his residence and drive to the Ladson, SC Post Office. MANSFIELD was seen entering the Post Office carrying a bag of mail. Several minutes later, HSI agents observed MANSFIELD leave the Post Office carrying mailing supplies. MANSFIELD returned to his residence. Soon after, HSI and other law enforcement officers executed a search warrant on MANSFIELD's residence.

11. HSI agents provided your affiant with mailing records obtained from the search. At approximately 11:55 AM, I reviewed the transaction records related to MANSFIELD's receipts at the Ladson Post Office. I determined MANSFIELD mailed the following 12 mail pieces, hereinafter referred to as "subject parcels" at

approximately 10:09 AM:

Tracking Number	Addressee	Return Address
9505 5109 6313 7055 0861 10	Robin Dalton 119 Monohan Dr Apt 209 Fort Walton Beach, FL 32547	LL, Summerville 3320 Mill Street Summerville, SC 29485
9505 5109 6313 7055 0861 27	Jordon Gaetano 2546 Battle Creek Rd Springfield, TN 37172	No Return Address
9505 5109 6313 7055 0861 34	Marc Conforto 5 Liberty St #2 East Taunton MA 02718	No Return Address
9505 5109 6313 7055 0861 41	Ryan Barry 6197 Fox Run Ln Florence, KY 41042	LL, Summerville 3320 Mill Street Summerville, SC 29485
9505 5109 6313 7055 0861 58	Patrick Wu 305 Picea View Ct Derwood, MD 20855	LL, Summerville 3320 Mill Street Summerville, SC 29485
9505 5109 6313 7055 0861 65	Robin Freichels 22397 Country Rd 75 NW Big Lake, MN 55309	LL, Summerville 3320 Mill Street Summerville, SC 29485
EL554172679US	Jordon Nelms 436 Spring View Dr Franklin, TN 37064	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL248955325US	Joshua Harris 2013 Collier Blvd O'Fallon, MO 63366	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL248955339US	Dedra Eichstept 1430 Sylvan Road SW Atlanta, GA 30310	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL554172665US	B Burkleg 775 Northwood Hills Dr Hernando MS 38632	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL554171276US	Rafael Luna 194 Dorchester Ave Unit A Asheville, NC 28806	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456
EL248955356US	Gesrae Rice 3125 Sunnyside St Stoughton, WI 53589	UTR Log Svcs 1395 Benchwalk Dr Ladson SC 29456

12. HSI agents reported to your affiant that when asked what he mailed in the parcels, MANSFIELD stated Fentanyl. Fentanyl is a schedule II substance under the Controlled Substance Act.

13. Your affiant obtained the twelve mailings from the post office and placed them inside a hazmat approved container. The container is being held by the Dorchester County clandestine lab team pending the issuance of a search warrant.

14. Based on the facts set forth herein, I believe probable cause exists that the subject parcel contains evidence, fruits or instrumentalities of narcotics trafficking in violation of 21 U.S.C. §§ 841 and 843.

15. I hereby request the court issue a search warrant for the subject parcels.

16. This affidavit has been reviewed by AUSA Nick Bianchi.

L. R. Moody
U. S. Postal Inspector

Sworn before me this 24th day of February 2017

Mary Gordon Baker
United States Magistrate Judge